SAVE BELL BOWL PRAIRIE

September 8, 2022

Agenda

1. Quick Background
2. Consultation Updates
3. Construction Plan Reminder
4. Geosyntec Report
5. Legal Updates
6. Interview with an Advocate!
7. Strategy
8. Upcoming Events

Graphic by Liz Anna Kozik

Why are we here?

- Bell Bowl Prairie: an 8,000 year old gravel prairie- one of the last in the state
- Greater Rockford Airport Authority- the public body that manages Bell Bowl Prairie- plans to build a road through the highest quality sections of the prairie.
- Construction was halted last fall when the Rusty-patched Bumblebee was found within the build site.

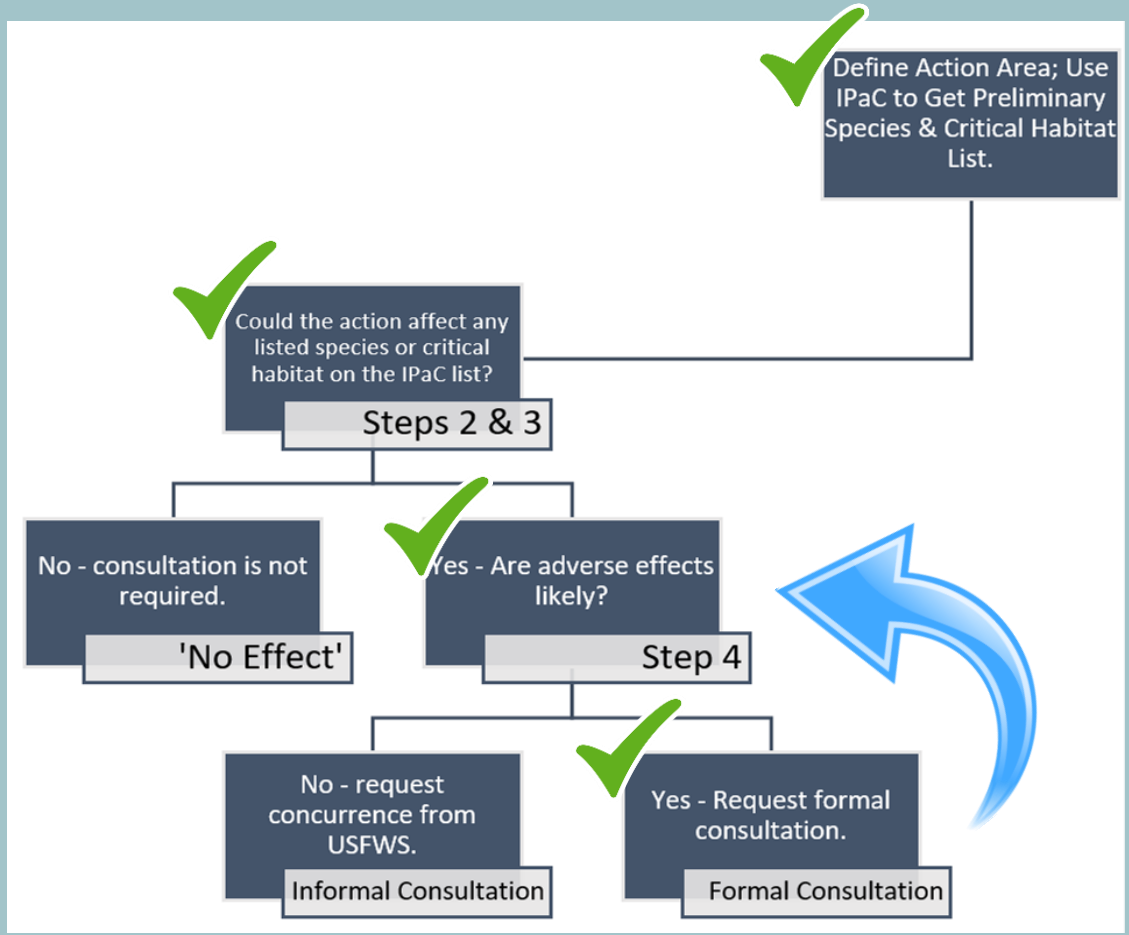
Photos by Jillian Neece and cassi sari

Updates: IDNR Consultation Timeline

- 11/18/2021 - IDNR sends updated consultation letter to FAA
- 08/31/2022 - Attorney for Federal defendants says consultation with IDNR is still open
    - Conversations with IDNR staff indicate that is not the case but that they have applied for Incidental Take Authorization (ITA) for state-listed endangered species
    - The ITA application for the Rockford Airport was submitted and issued # 247. Conservation Plan is “pending”
    - After Conservation Plan is complete there will be a public comment period
    - Notice in official State newspaper and local newspaper
    - To be notified and put on the “interested parties” list by emailing DNR.ITACoordinator@illinois.gov
    - https://www2.illinois.gov/sites/naturalheritage/permits/Pages/Incidental-Take-Authorizations.aspx

Updates: USFWS Consultation Timeline

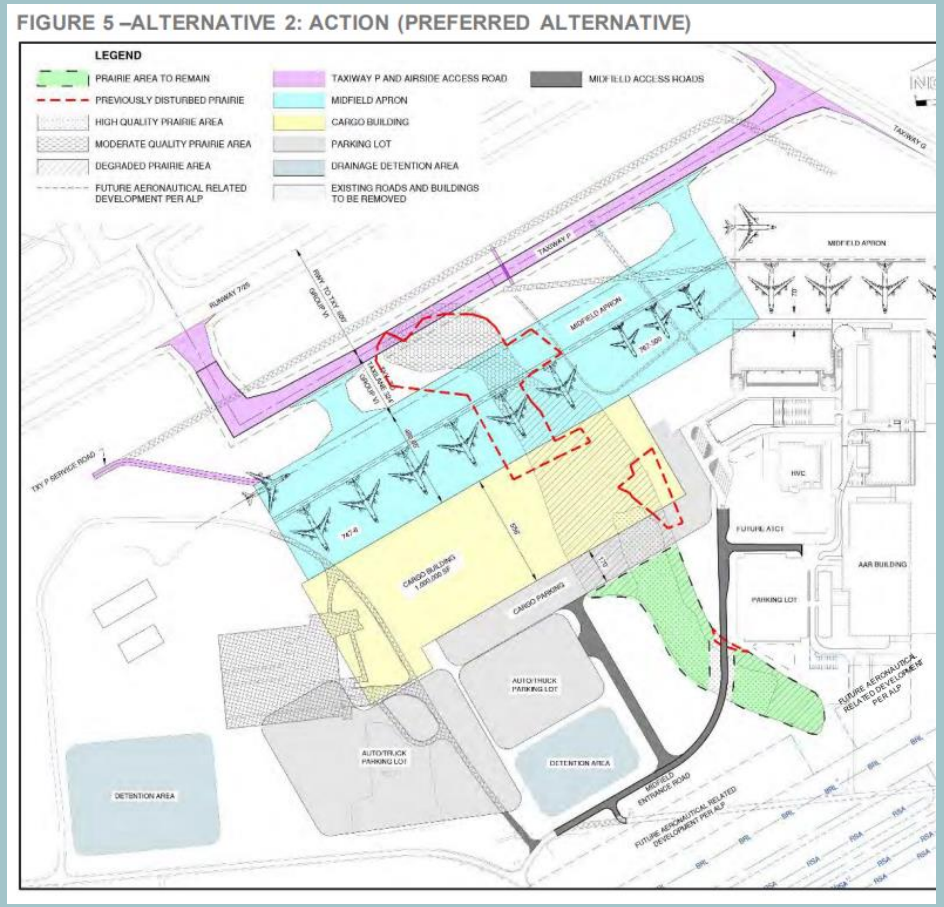
- 4/18/2022 - FAA submit a Biological Assessment to the USFWS
- 5/5/2022 - USFWS Responds to FAA BA initiating **formal consultation** under Section 7 of the Endangered Species Act
- 8/4/2022 - USFWS has asked FAA to reconsider the finding of “likely to adversely affect” the rusty patched bumblebee
  - FAA assumes it will be used as nesting habitat
  - FAA assumes removal of foraging habitat exceeding 2 acres
  - USFWS points out 4 “High Potential Zones” for RPBB within 10 km
  - USFWS asks for clarification regarding stewardship/enhancement plan in the Conservation Measures proposed by FAA



Source: https://www.fws.gov/midwest/endangered/section7/s7process/s7stepxstep.html

Reminder: Airport's Plan

- Road goes directly through the most biodiverse section of prairie
- Retains (for now) only 6 acres of prairie
- "Accommodate[s] the forcast air cargo operations"- 2022 BA



Reminder: Issues with Airport's Alternatives

- Chosen due to safety predictions based on the road curvature and grading
  - "Future Aeronautical Related Development"
- Designs assume the future construction of a 3rd runway, which "would require **relocating roadways and a railroad**, and would require **substantial land acquisition with residential, commercial and industrial property relocations**"- RFD 2013 Master Plan
- In short, relocating the road would disrupt their long term plans to destroy a neighborhood

Airport Design Analysis and Recommendation

- Report by Dennis Dreher and Dawn Brook of Geosyntec
- Evaluation of all alternatives proposed by the FAA/Rockford Airport in the BA
- Combines some alternatives proposed by the airport to avoid high quality prairie, while delivering what the airport says they need
- Has been shared with FAA, elected officials, and the airport

FIGURE 2 – ACTION AREA

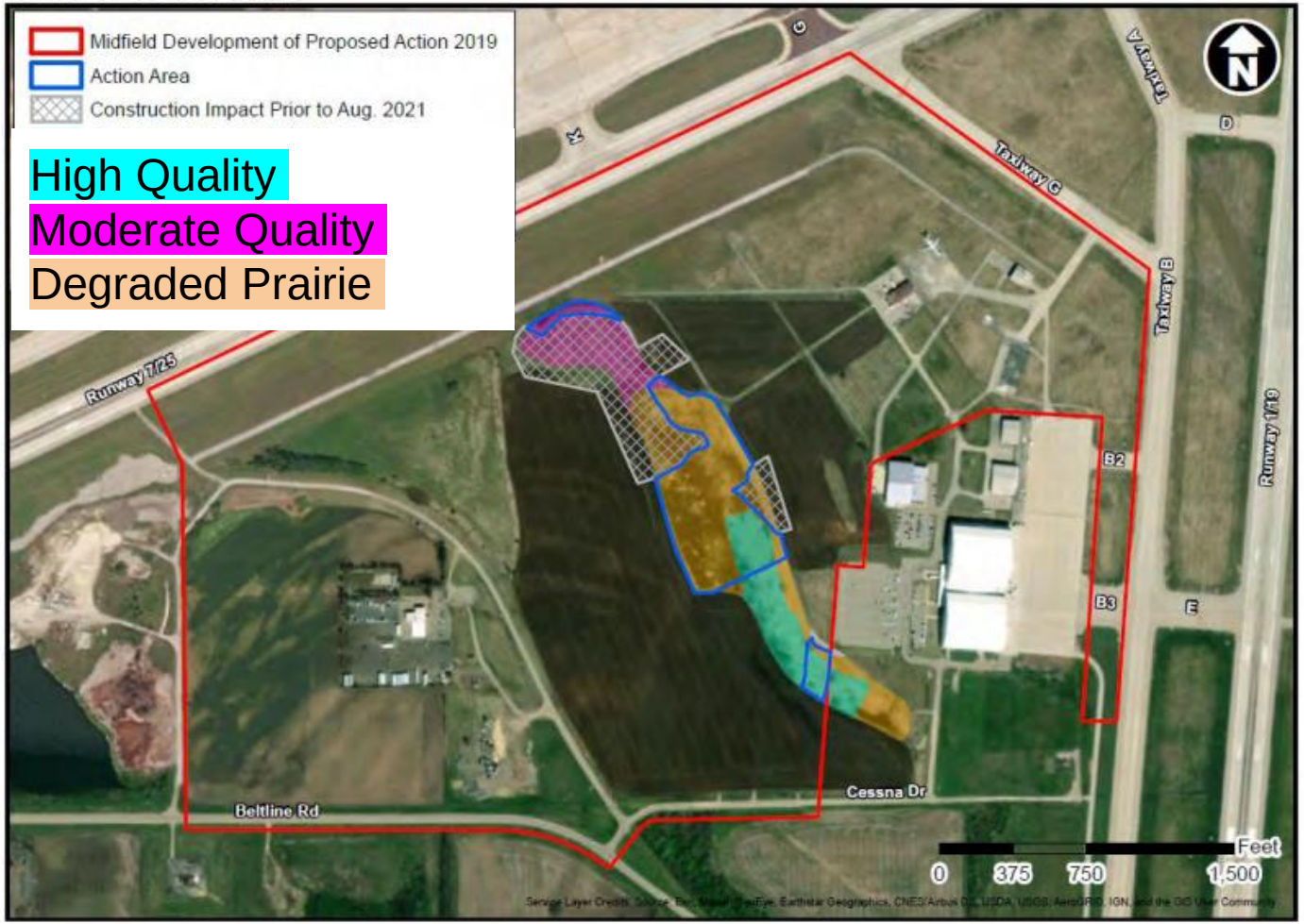
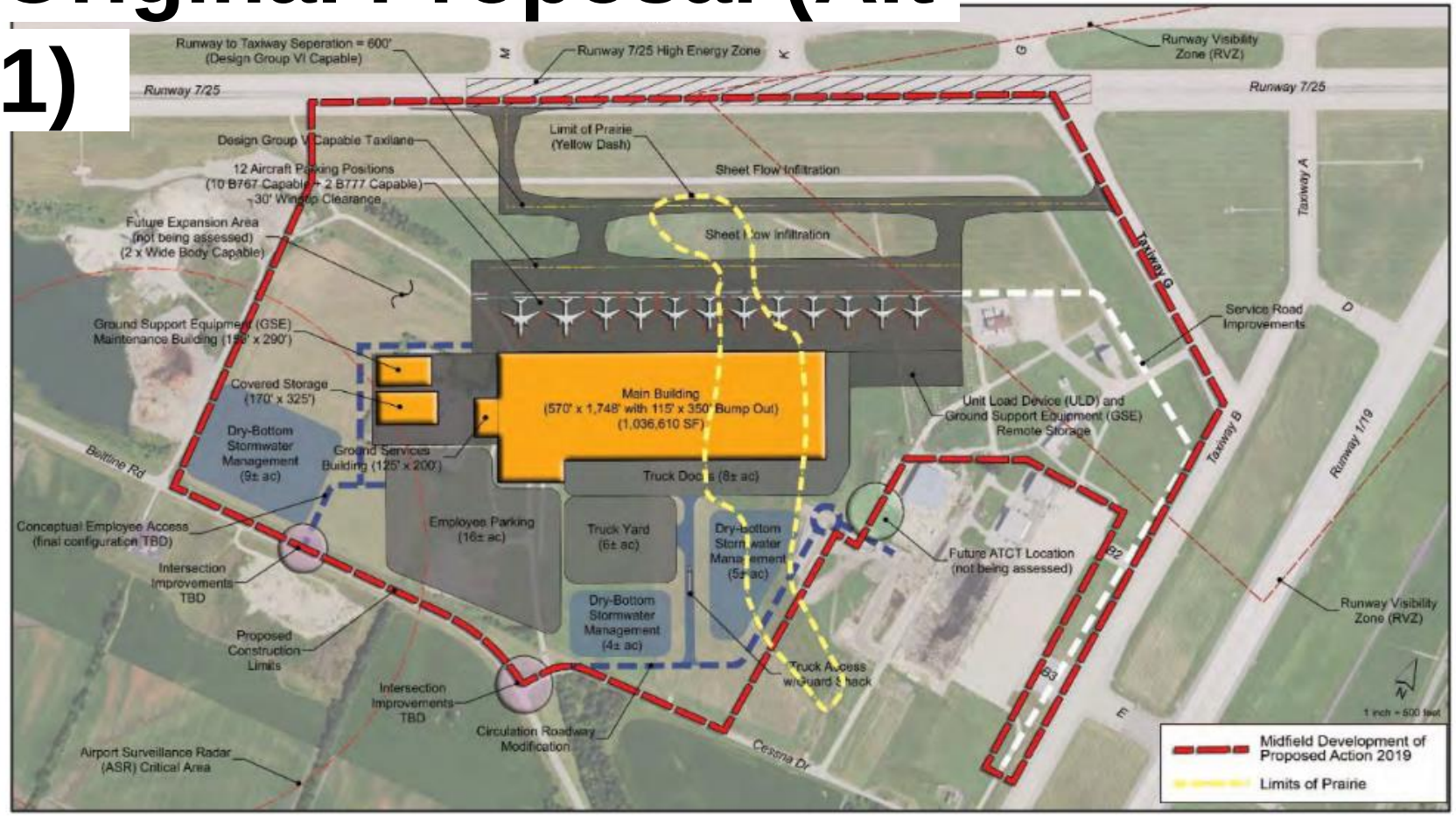


TABLE 1: ALTERNATIVES SUMMARY

Evaluation Factor	No Action	Alt 1: Original Action (2019)	Alt 2: Action	Alt 3: Northern Alignment	Alt 4: Eastern Alignment	Alt 5: Southeastern Alignment	Alt 6: Bridge Alignment
Meets Purpose and Need	No	Yes	Yes	No	Yes	Yes	Yes
Prairie Impact	0 acres	13.2 acres	9.3 acres	3.6 acres	8.7 acres	8.7 acres	8.7 acres direct 0.7 acres indirect
Prairie Retention	15.5 acres	2.4 acres	6.2 acres	11.8 acres	6.7 acres	6.7 acres	6.7 acres
Midfield Entrance Road Safety							
Crashes per 20 Year Design Horizon	47.6	5.6	5.6	8.4	14	15.7	7.5
Conforms to IDOT BLRS Recommendations for Roadway Radius and Superelevation*	NA	Yes	Yes	Yes	No	No	Yes

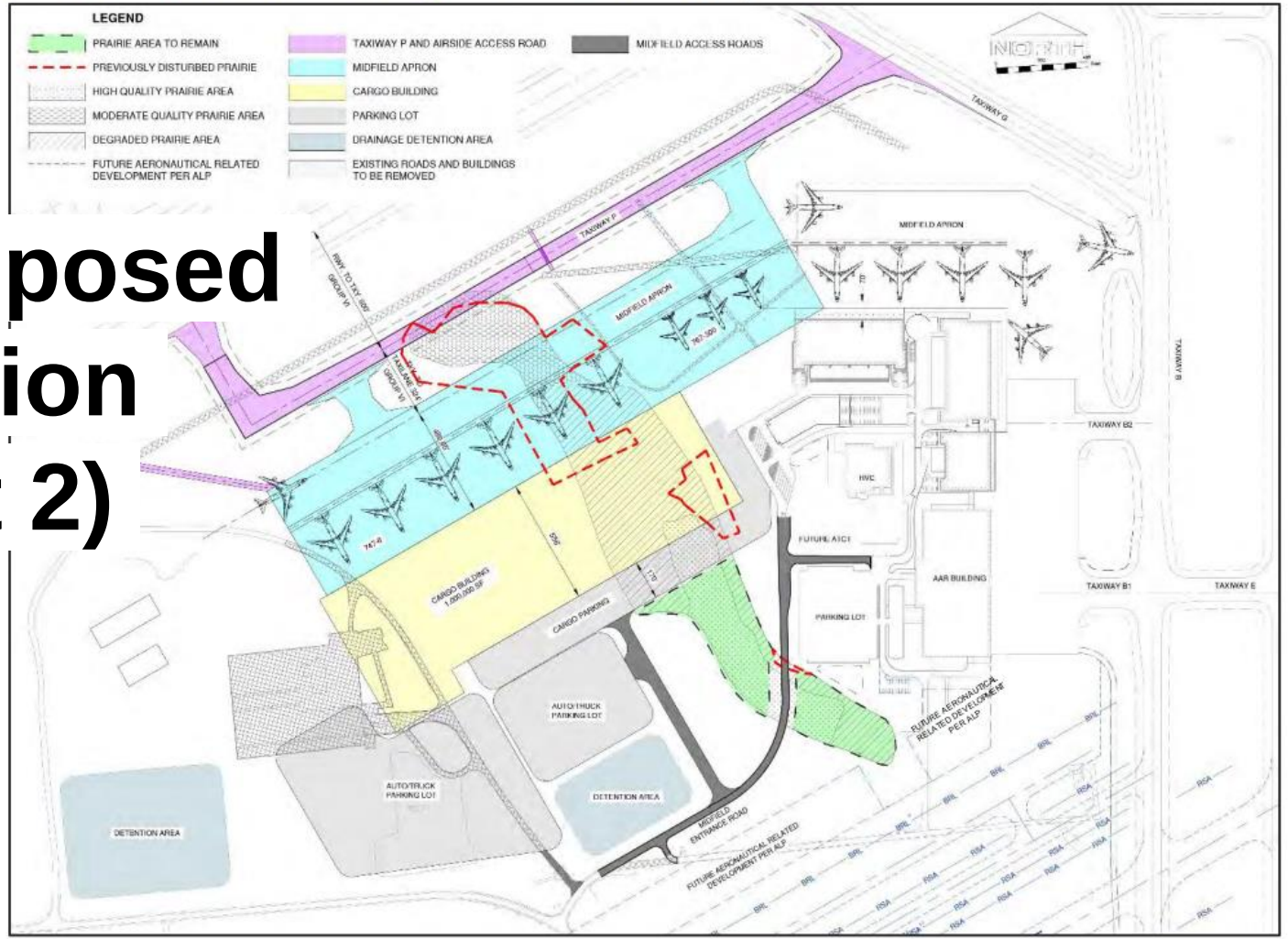
*The Illinois Department of Transportation Bureau of Local Roads and Streets Design Manual recommends avoidance of minimum curve radii and maximum superelevation in areas subject to ice and snow. The City of Rockford, Illinois averages 35 inches of snow per year.

Original Proposal (Alt 1)



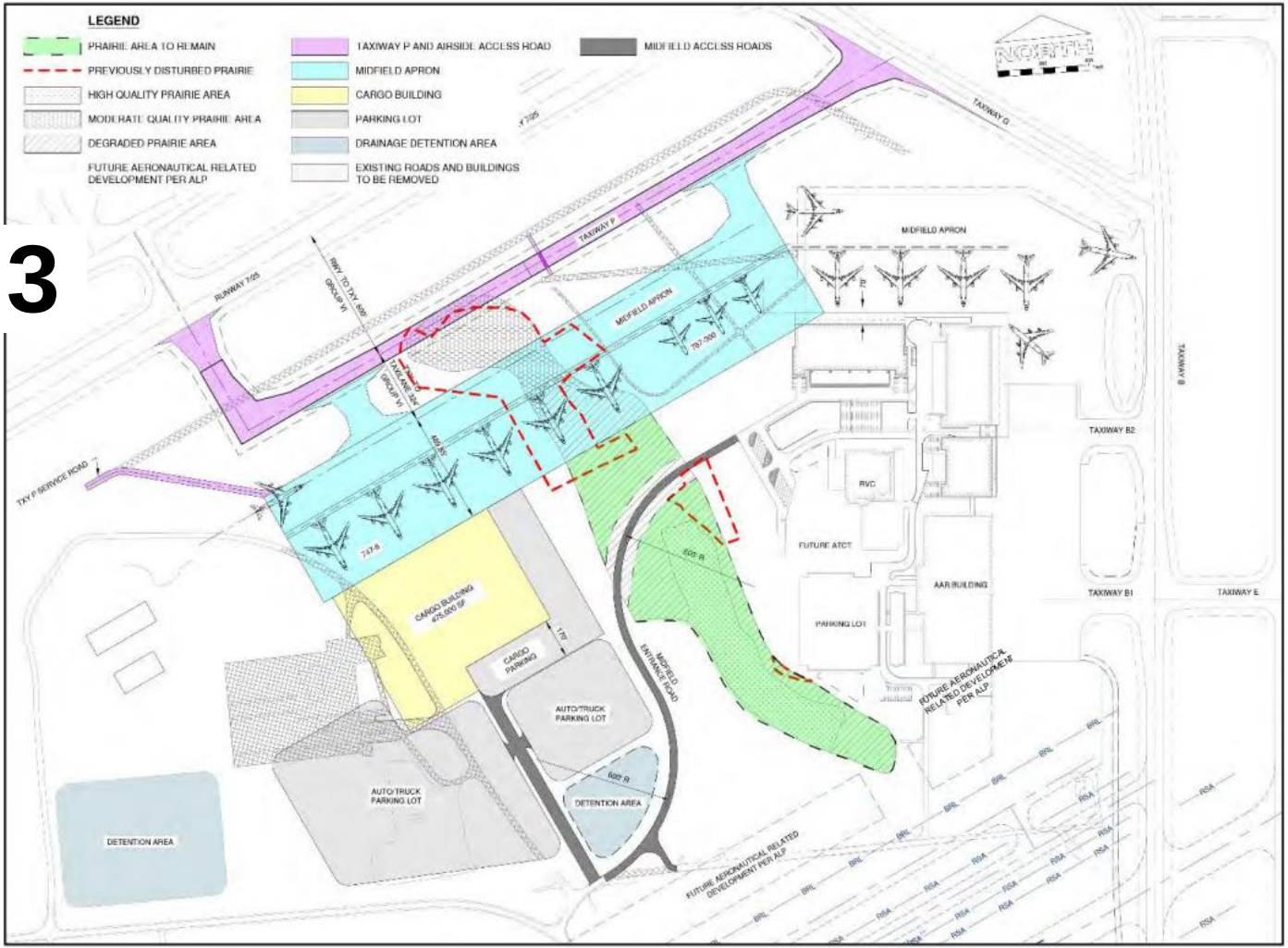
Proposed Action (Alt 2)

FIGURE 5 –ALTERNATIVE 2: ACTION (PREFERRED ALTERNATIVE)



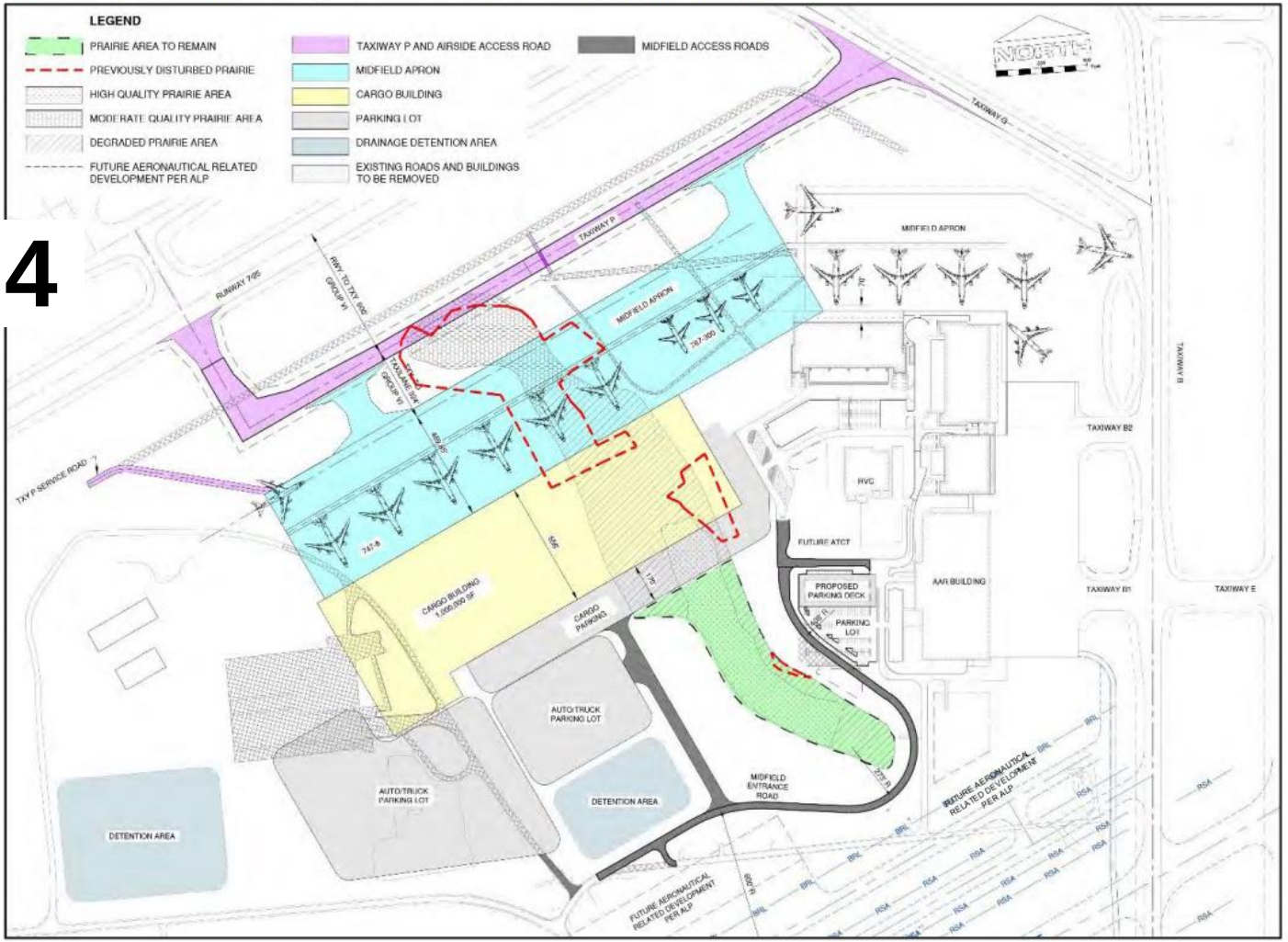
Alt 3

FIGURE 6 – ALTERNATIVE 3: NORTHERN ACCESS ROAD ALIGNMENT



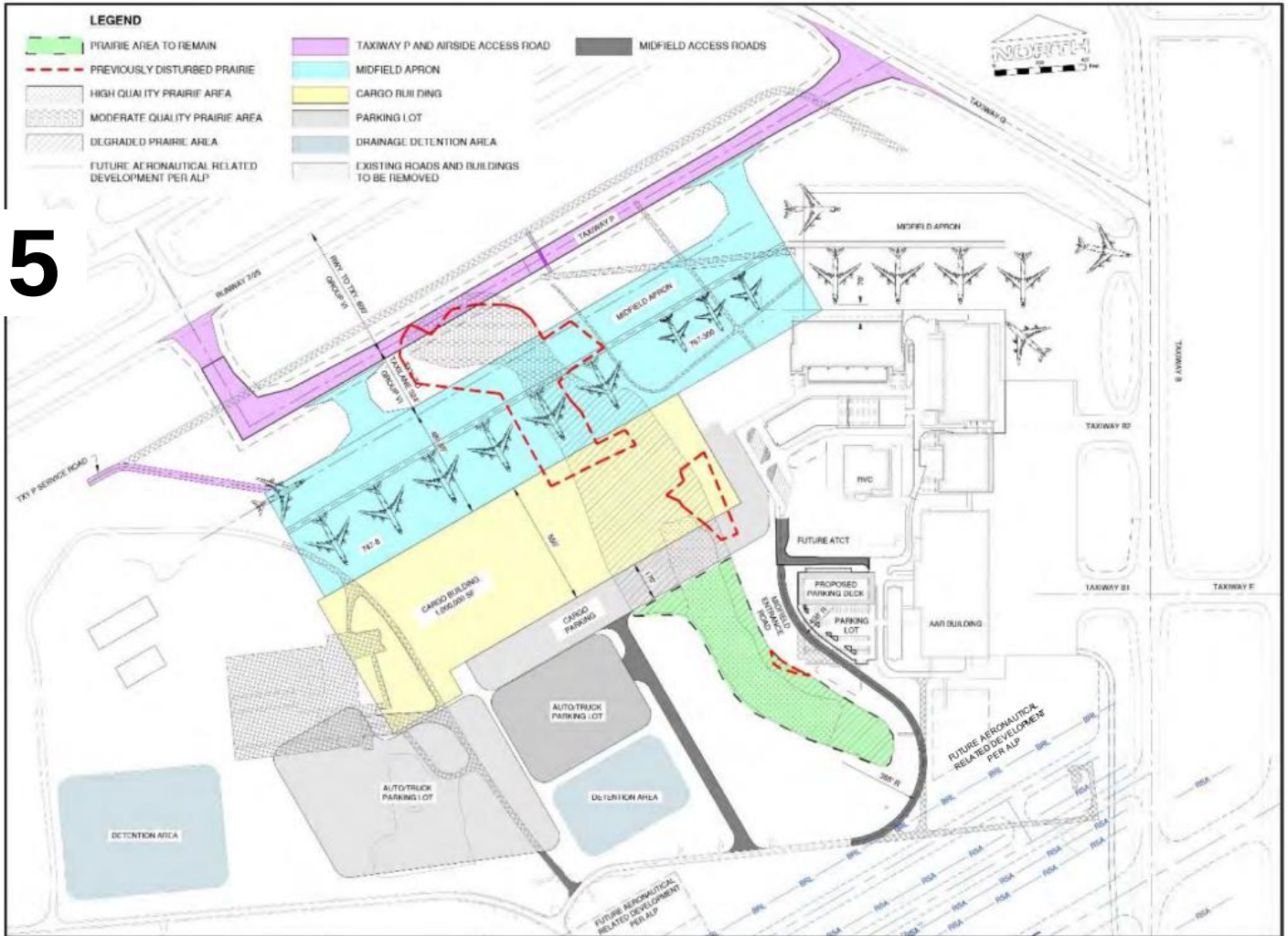
Alt 4

FIGURE 7 – ALTERNATIVE 4: EASTERN ACCESS ROAD ALIGNMENT



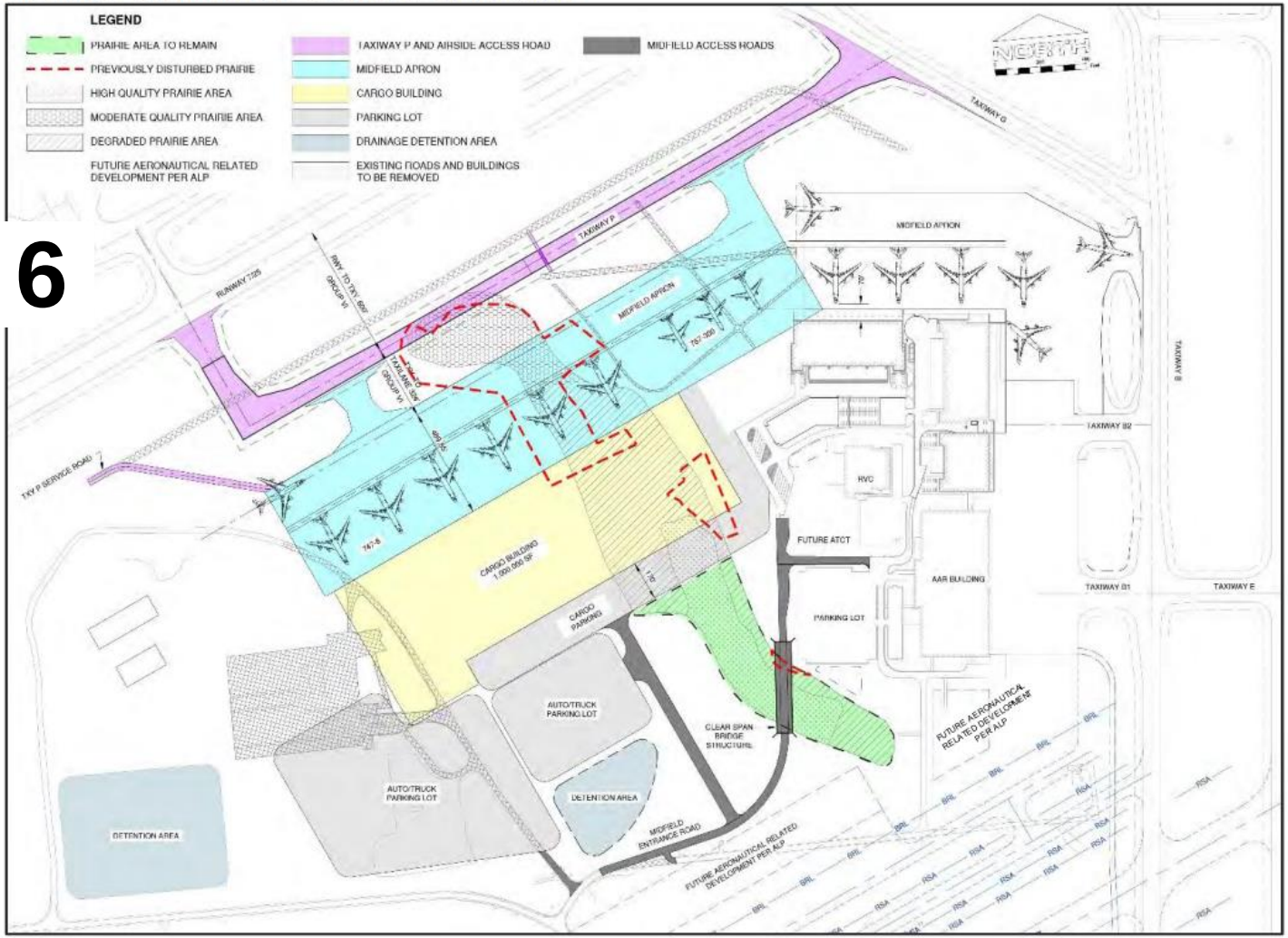
Alt 5

FIGURE 8 – ALTERNATIVE 5: SOUTHEASTERN ACCESS ROAD ALIGNMENT



Alt 6

FIGURE 9 – ALTERNATIVE 6: BRIDGE ALIGNMENT



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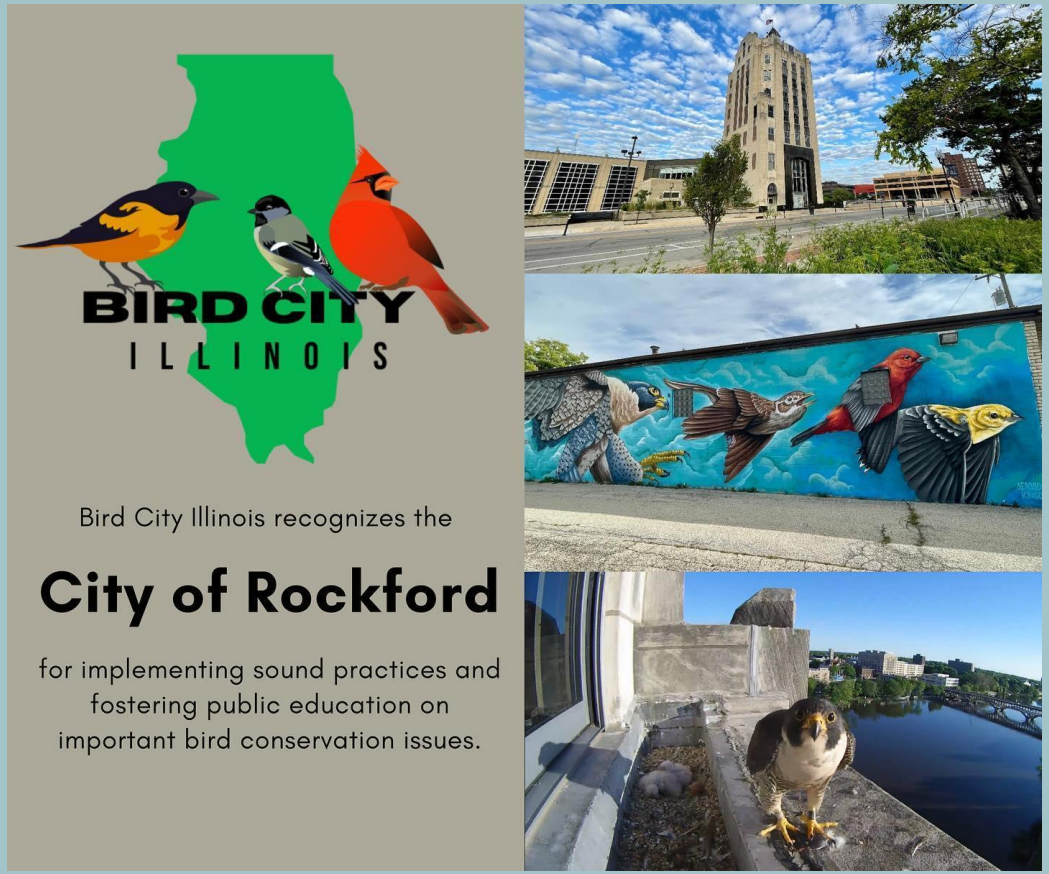
Legal Update

- Reminder: Natural Land Institute's Lawsuit
  - Against GRAA, USFWS, USDOT, FAA, USDOI
- August 31: Jurisdictional hearing
  - Judge asked if either side was interested in mediation - attorney for the airport said that they are not
  - Judge dismissed the lawsuit "without prejudice"
  - Did not believe the threats to the prairie are currently "ripe" because consultation is still underway
  - Leaves the option open for the lawsuit to be re-filed once the threat is "ripe," aka once consultation is over

Interview with an Advocate!

- Jennifer Kuroda of Sinnissippi Audubon!



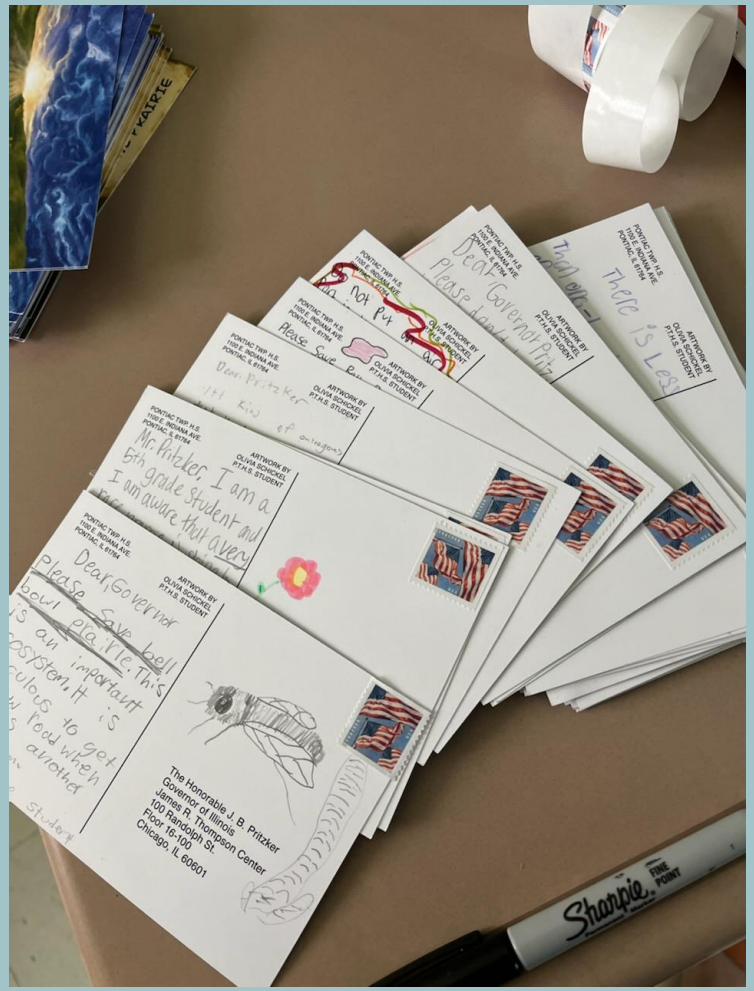
Fall Strategy

- Pressure on local officials (they appointed the board!)
  - Mayors of Rockford, Loves Park, and Machesney Park
  - Winnebago County Board
- Pressure on state and federal elected officials (they have influence with USFWS, FAA, IDOT, and funding sources!)
  - Governor Pritzker, Senator Durbin, Senator Duckworth
  - State Reps West, Vella, and Stadelman
- Pressure on airport clients (the airport listens to them!)
  - Amazon, UPS

Photos by Paul Goyette

Upcoming Events

- Sept 11: Cycle on 2nd for Bell Bowl Prairie!
- Sept 19: Rockford City Council Meeting
- Sept 22: GRAA Board Meeting
- Sept 22: Winnebago County Board Meeting
- Sept 30: Table at Rockford City Market
- Oct 3: Rockford City Council Meeting
- Oct 17: Rockford City Council Meeting

Action Now!

- In-person? Fill out a few postcards to mail to local officials!
- On Zoom? Make a social media post about Bell Bowl Prairie and tag local officials!